UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

RICHARD A. GORMAN,

Civil Action No. 2:20-cv-04759-JCJ

Plaintiff,

-against-

MOTION TO DISMISS

ILLYA SHPETRIK,

Defendant.

Defendant Illya Shpetrik, ("Defendant") by and through his undersigned counsel, respectfully moves the Court to dismiss this lawsuit and all counts against him under Rules 8 and 12(b)(2), 12(b)(5) and 12(b)(6) of the Federal Rules of Civil Procedure; and grant all such further relief as the Court may deem just and proper. Defendant concurrently files herewith a Memorandum of Law and a Declaration in support of this Motion, and incorporates both herein.

Dated: April 26, 2021

By: /s/ Matthew Faranda-Diedrich
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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RICHARD A. GORMAN,	:
Plaintiff,	
v. ILYA SHPETRIK,	: Case No.: 2:20-cv-04759-JCJ
Defendant.	: : :

I hereby certify that a true and correct copy of the foregoing Motion to Dismiss Complaint and accompany documents has been filed electronically and is available for viewing and downloading from the ECF system to all counsel of record.

Dated: April 26, 2021 /s/ Matthew Faranda-Diedrich / Matthew Faranda-Diedrich, Esquire